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Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

JENNIE QUAN, individually and as
successor in interest to BENJAMIN
CHIN, deceased,

Plaintiffs,

vs.

COUNTY OF LOS ANGELES;
MARISOL BARAJAS; HECTOR
VAZQUEZ; and DOES 3-10, inclusive,

Defendants.

Case No. 2:24-cv-04805-MCS-KS

Assigned to:

Hon Mark C. Scarsi

Hon. Mag. Judge Karen L. Stevenson

JOINT WITNESS LIST

Final Pretrial Conference:

Date: January 26, 2026

Time: 2:00 p.m.

Crtrm: 7C

Trial:

Date: February 10, 2026

TO THE HONORABLE COURT:

Plaintiff Jennie Quan and Defendants County of Los Angeles, Marisol Barajas, and Hector Vazquez, by and through their respective counsel of record, hereby submit their Joint Witness List pursuant to the Court's Order re: Jury/Court Trial.

DATED: January 5, 2026

LAW OFFICES OF DALE K. GALIPO

By /s/ Hang D. Le

Dale K. Galipo

Hang D. Le

Attorneys for Plaintiff

DATED: January 5, 2026

HURRELL CANTRALL LLP

By /s/ Jerad J. Miller*

Thomas C. Hurrell

Janet J. Hur

Jerad J. Miller

Attorneys for Defendant, County of Los Angeles

*The filer, Hang D. Le, hereby attests that all other signatories listed, and on whose behalf the filing is submitted, concur with the filing's content and have authorized the filing.

PLAINTIFF'S WITNESS LIST

Witness's Name, Phone Number, Address	Summary of Testimony/ Why Testimony Unique	Time for Direct Exam (hours)	Time for Cross Exam (hours)		Dates of Testimony
1. Defendant Hector Vazquez, c/o defense counsel	Defendant Hector Vazquez was one of the two deputies who used deadly force against Decedent Benjamin Chin. Deputy Vazquez is expected to testify as to his knowledge of Decedent and the call for service on the day of the incident, his observations when he responded to the scene, his observations of Decedent, and the facts and circumstances that led to his use of deadly force.	1.5-2 hours	1.5 – 2.0 hours		
2. Defendant Marisol Barajas, c/o defense counsel	Defendant Marisol Barajas was one of the two deputies who used deadly force against Decedent Benjamin Chin. Deputy Barajas is expected to testify as to her knowledge of Decedent and the call for service on the day of the incident, her observations when	1.5-2 hours	1.5 – 2.0 hours		

Witness's Name, Phone Number, Address	Summary of Testimony/ Why Testimony Unique	Time for Direct Exam (hours)	Time for Cross Exam (hours)		Dates of Testimony
	she responded to the scene, her observations of Decedent, and the facts and circumstances that led to her use of deadly force.				
3. Deputy Chad Holland ¹ , c/o defense counsel	Deputy Chad Holland was an LA County Sheriff's Deputy who responded to the scene of the incident in response to a call for service. He was present at the scene and had his gun pointed at the Decedent Benjamin Chin but never fired his gun. He is expected to testify as to his knowledge of Decedent and the call for service, his observations when he responded to the scene, and the facts and circumstances surrounding Deputy Barajas and Deputy Vazquez's uses of	0.5 hours	0.5 hours		Deputy Chad Holland ² , c/o defense counsel

¹ Indicates that witness will be called only if need arises.

² Indicates that witness will be called only if need arises.

Witness's Name, Phone Number, Address	Summary of Testimony/ Why Testimony Unique	Time for Direct Exam (hours)	Time for Cross Exam (hours)		Dates of Testimony
	deadly force against Decedent.				
4. Deputy Kyle Toves*, c/o defense counsel	Deputy Kyle Toves was an LA County Sheriff's Deputy who responded to the scene of the incident in response to a call for service. He was present at the scene when other deputies used force against Decedent Benjamin Chin. He is expected to testify as to his knowledge of Decedent and the call for service, his observations when he responded to the scene, and the facts and circumstances surrounding Deputy Barajas and Deputy Vazquez's uses of deadly force against Decedent.	0.5 hours	0.5 hours		Deputy Kyle Toves*, c/o defense counsel
5. Deputy Carlos De La Torres*, c/o defense counsel	Deputy Kyle Toves was an LA County Sheriff's Deputy who responded to the scene of the incident in response to a call for service. He was	0.5 hours	0.5 hours		Deputy Carlos De La Torres*, c/o defense counsel

Witness's Name, Phone Number, Address	Summary of Testimony/ Why Testimony Unique	Time for Direct Exam (hours)	Time for Cross Exam (hours)		Dates of Testimony
	present at the scene when other deputies used force against Decedent Benjamin Chin. He is expected to testify as to his knowledge of Decedent and the call for service, his observations when he responded to the scene, and the facts and circumstances surrounding Deputy Barajas and Deputy Vazquez's uses of deadly force against Decedent.				
6. Deputy Christopher Bronowicki*, c/o defense counsel	Deputy Christopheher Bronowicki was an LA County Sheriff's Deputy who responded to the scene of the incident in response to a call for service. He was present at the scene when other deputies used force against Decedent Benjamin Chin. He is expected to testify as to his knowledge of Decedent and the call for service, his	0.5 hours	0.5 hours		Deputy Christopher Bronowicki*, c/o defense counsel

Witness's Name, Phone Number, Address	Summary of Testimony/ Why Testimony Unique	Time for Direct Exam (hours)	Time for Cross Exam (hours)		Dates of Testimony
	observations when he responded to the scene, and the facts and circumstances surrounding Deputy Barajas and Deputy Vazquez's uses of deadly force against Decedent.				
7. Deputy German Perez*, c/o defense counsel	Deputy German Perez was an LA County Sheriff's Deputy who responded to the scene of the incident in response to a call for service. He was present at the scene when other deputies used force against Decedent Benjamin Chin. He was part of a group that made the approach to Decedent after the shooting and helped render aid to Decedent. He is expected to testify as to his knowledge of Decedent and the call for service, his observations when he responded to the scene, and the facts and circumstances surrounding Deputy	0.5 hours	0.5 hours		Deputy German Perez*, c/o defense counsel

Witness's Name, Phone Number, Address	Summary of Testimony/ Why Testimony Unique	Time for Direct Exam (hours)	Time for Cross Exam (hours)		Dates of Testimony
	Barajas and Deputy Vazquez's uses of deadly force against Decedent.				
8. Jeffrey Noble, Rancho Santa Margarita, CA 92688; (949) 279-4678	Mr. Noble is Plaintiff's retained police practices expert. Mr. Noble will testify regarding standard police practices training for pre-force tactics and conduct and use of deadly force as it relates to this incident. He is further expected to give opinions regarding whether the deputies' conduct and use of force were appropriate based on standard police officer training and practices.	1.0-1.5 hours	1.0 hours		Jeffrey Noble, Rancho Santa Margarita, CA 92688; (949) 279-4678
9. Justin Rosander, JSM Forensics, 872 Higuera Street, San Luis Obispo, CA 934001; (559) 321-2009, ext.	Mr. Rosander is Plaintiff's retained forensic video expert. Mr. Rosander synced the BWC videos of Deputies Barajas and Vazquez. He further corrected for the videos for lens distortion and did a	0.5-1 hours	0.5 hours		Justin Rosander, JSM Forensics, 872 Higuera Street, San Luis Obispo, CA 934001; (559) 321-2009, ext.

Witness's Name, Phone Number, Address	Summary of Testimony/ Why Testimony Unique	Time for Direct Exam (hours)	Time for Cross Exam (hours)		Dates of Testimony
700	frame-by-frame analysis of the videos, including analyzing the videos for pixel distortion and artifacts. Mr. Rosander will testify as to his opinions regarding the chronology of the shots and when they occurred, and whether certain facts can or cannot be discerned from the video.				700
10. John Aldama, c/o defense counsel	Mr. Aldama is a paramedic for the Los Angeles County Fire Department. Mr. Aldama responded to the scene after the shooting, treated Benjamin Chin for his injuries and transported Mr. Chin to the hospital. Mr. Aldama is expected to testify to the injuries he observed on Mr. Chin, any and all medical care and treatment he provided or observed being provided to Mr. Chin, Mr. Chin's state of	0.5 hours	0.5 hours		John Aldama, c/o defense counsel

Witness's Name, Phone Number, Address	Summary of Testimony/ Why Testimony Unique	Time for Direct Exam (hours)	Time for Cross Exam (hours)		Dates of Testimony
	consciousness during his interactions with Mr. Chin,, and any information he was given regarding the incident.				
11. Kyle Groff*, c/o defense counsel	Mr. Groff is a paramedic for the Los Angeles County Fire Department. Mr. Groff responded to the scene after the shooting, treated Benjamin Chin for his injuries and transported Mr. Chin to the hospital. Mr. Groff is expected to testify to the injuries he observed on Mr. Chin, any and all medical care and treatment he provided or observed being provided to Mr. Chin, Mr. Chin's state of consciousness during his interactions with Mr. Chin,, and any information he was given regarding the incident.	0.5 hours	0.5 hours		Kyle Groff*, c/o defense counsel
12. Onoaona Uano	Dr. Gurney was a physician at Pomona	0.5 hours	0.5 hours		Onoaona Uano

Witness's Name, Phone Number, Address	Summary of Testimony/ Why Testimony Unique	Time for Direct Exam (hours)	Time for Cross Exam (hours)		Dates of Testimony
Gurney, MD, Pomona Valley Hospital Center, 1798 N. Garey Ave, Pomona, CA 91767-2918; (909) 865-9500	Valley Hospital Center who treated Benjamin Chin when he was brought in on June 19, 2023, after the shooting incident. Dr. Gurney was the admitting and attending physician for Decedent's care. Dr. Gurney provided medical care and treatment to Mr. Chin. Dr. Gurney is expected to testify to his or her observations of Mr. Chin's injuries and diagnoses at the hospital, and any medical treatment or care, including surgical intervention, provided to Mr. Chin.				Gurney, MD, Pomona Valley Hospital Center, 1798 N. Garey Ave, Pomona, CA 91767-2918; (909) 865-9500
13. Gabriel Estermera, MD*, Pomona Valley Hospital Center, 1798 N. Garey Ave, Pomona, CA 91767-2918;	Dr. Estermera was a physician at Pomona Valley Hospital Center who treated Benjamin Chin when he was brought in on June 19, 2023, after the shooting incident. Dr. Estermera provided medical care and treatment to Mr.	0.5 hours	0.5 hours		Gabriel Estermera, MD*, Pomona Valley Hospital Center, 1798 N. Garey Ave, Pomona, CA 91767-2918;

Witness's Name, Phone Number, Address	Summary of Testimony/ Why Testimony Unique	Time for Direct Exam (hours)	Time for Cross Exam (hours)		Dates of Testimony
(909) 865-9500	Chin. Dr. Estermera is expected to testify to his or her observations of Mr. Chin's injuries and diagnoses at the hospital, and any medical treatment or care, including surgical intervention, provided to Mr. Chin.				(909) 865-9500
14. Paul Sungjun Park, MD, Pomona Valley Hospital Center, 1798 N. Garey Ave, Pomona, CA 91767-2918; (909) 865-9500	Dr. Park was a physician at Pomona Valley Hospital Center who treated Benjamin Chin when he was brought in on June 19, 2023, after the shooting incident. Dr. Park performed a surgical pathological examination of Mr. Chin. Dr. Park is expected to testify as to his observations of Mr. Chin's organs and injuries during his examination as well as his pathologic diagnoses.	0.5 hours	0.5 hours		Paul Sungjun Park, MD, Pomona Valley Hospital Center, 1798 N. Garey Ave, Pomona, CA 91767-2918; (909) 865-9500
15. Stephen Y.C. To, MD*, Pomona	Dr. To was a physician at Pomona Valley Hospital Center who treated	0.5 hours	0.5 hours		Stephen Y.C. To, MD*, Pomona

Witness's Name, Phone Number, Address	Summary of Testimony/ Why Testimony Unique	Time for Direct Exam (hours)	Time for Cross Exam (hours)		Dates of Testimony
Valley Hospital Center, 1798 N. Garey Ave, Pomona, CA 91767-2918; (909) 865- 9500	Benjamin Chin when he was brought in on June 19, 2023, after the shooting incident. Dr. To took abdominal radiographs of Mr. Chin. He is expected to testify as to his observations, findings, impressions, and conclusions from the radiographs.				Valley Hospital Center, 1798 N. Garey Ave, Pomona, CA 91767-2918; (909) 865- 9500
16. Paul V. Gliniecki, MD, Los Angeles County Department of Medical Examiner, 1101 N Mission Rd, Los Angeles, CA 90033; (323) 343- 0512	Dr. Gliniecki was the medical examiner who performed the autopsy Benjamin Chin. Dr. Gliniecki is expected to testify on the autopsy he performed on Mr. Chin, the external examination of Mr. Chin's body, the nature and extent of Mr. Chin's injuries, the cause and manner of the injuries found on Mr. Puga's Chin, the trajectory of the gunshot wounds to Mr. Chin's body, the internal examination of Mr. Chin's body, any other findings	0.75-1 hours	0.5 hours		Paul V. Gliniecki, MD, Los Angeles County Department of Medical Examiner, 1101 N Mission Rd, Los Angeles, CA 90033; (323) 343- 0512

Witness's Name, Phone Number, Address	Summary of Testimony/ Why Testimony Unique	Time for Direct Exam (hours)	Time for Cross Exam (hours)		Dates of Testimony
	from Mr. Chin's autopsy, the manner and cause of death, and any hypotheticals posed to Dr. Gliniecki based on his personal knowledge and observations from the autopsy.				
17. Bennet Omalu, MD, 1621 Executive Court, Sacramento, CA 95864; (279) 345-1300	Dr. Omalu is Plaintiff's retained Forensic Pathologist. He is expected to testify on his opinions regarding Decedent's injuries, manner and cause of death, trajectory of gunshot wounds, and body positioning when Decedent sustained the gunshot wounds based on his review of Decedent's medical records, autopsy report, and video evidence. He is further expected to testify on the pain and suffering Decedent experienced prior to his death.	1.0-1.5 hours	1.0 hours		Bennet Omalu, MD, 1621 Executive Court, Sacramento, CA 95864; (279) 345-1300
18. Plaintiff Jennie Quan,	Plaintiff Jennie Quan interacted with	0.75-1.0	1.0 hours		Plaintiff Jennie Quan,

Witness's Name, Phone Number, Address	Summary of Testimony/ Why Testimony Unique	Time for Direct Exam (hours)	Time for Cross Exam (hours)		Dates of Testimony
c/o of Plaintiff's counsel	Decedent on the day of the incident and was present in the neighborhood when Decedent was shot. Plaintiff is expected to testify regarding her observations of Decedent's behavior, his lack of drug or behavioral/mental illness history, and her interactions with Decedents and law enforcement on that day. Ms. Quan will further provide testimony regarding Decedent's life, her relationship with Decedent, and additional testimony regarding damages.	hours			c/o of Plaintiff's counsel
19. Stephanie Chin, c/o Plaintiff's counsel	Stephanie Chin is Plaintiff's daughter and decedent's sister. Ms. Chin was present with Plaintiff and Decedent earlier on the day of the incident and can testify to Decedent's behavior and communications she received from the Kaiser doctor who	0.5-0.75 hours	0.5 hours		Stephanie Chin, c/o Plaintiff's counsel

Witness's Name, Phone Number, Address	Summary of Testimony/ Why Testimony Unique	Time for Direct Exam (hours)	Time for Cross Exam (hours)		Dates of Testimony
	prescribed Decedent medication that day. Ms. Chin can also provide testimony regarding Decedent's and Plaintiff's damages.				
20. Hanh Duc Truong, LMFT*, Kaiser Permanente Southern California, Santa Ana Medical Offices, Pyschiatry, 1900 E. 4 th St, Santa Ana, CA 92705-3910; (888) 988-2800	Mr. Truong is a Licensed Marriage and Family Therapist at Kaiser Permanent Southern California and treated Plaintiff Jennie Quan after the shooting incident. Mr. Truong is expected to testify as to her diagnostic impression of Ms. Quan as it relates to Mr. Chin's passing, including any DSM diagnoses, treatment recommendations and plans devised for Ms. Quan, and Ms. Quan's treatment progress.	0.5 hours	0.5 hours		Hanh Duc Truong, LMFT*, Kaiser Permanente Southern California, Santa Ana Medical Offices, Pyschiatry, 1900 E. 4 th St, Santa Ana, CA 92705-3910; (888) 988-2800

DEFENDANTS' WITNESS LIST

Name of Witness	Subject of Testimony	Direct	Cross
1. Jennie Quan, c/o plaintiff counsel	She is the Plaintiff in this case. She will testify as to the damages that the death of Benjamin Chin ("Decedent") has purported to cause her, as well as the relationship she had with the Decedent.	1.0	0.75-1.0
2. Marisol Barajas, c/o defense counsel	She is Deputy for the Los Angeles County Sheriff's Department ("LASD"). She will testify that the Decedent ignored her commands to drop his rifle on Diamond Bar Boulevard. She will testify as to the facts known to her regarding the Decedent prior to encountering him on Diamond Bar Boulevard. She will testify that she fired at least three shots at the Decedent. She will testify that a civilian, Brandon Wiseman, was inside his parked Tesla next to her on Diamond Bar Boulevard.	1.0	1.5 - 2.0
3. Hector Vazquez, c/o defense counsel	He is a Detective for the Los Angeles County Sheriff's Department. He will testify that the Decedent ignored his commands to drop his rifle. He will testify as to the facts known to him regarding the Decedent prior to encountering him on Diamond Bar Boulevard. He will testify that he shot at the Decedent two times.	1.0	1.5 - 2.0
4. Kyle Toves*, c/o defense counsel	He is a Deputy for the Los Angeles County Sheriff's Department. He will testify that he witnessed the Decedent walking on Diamond Bar Boulevard with an AR-15 and a bullet-proof vest. He will testify as to the facts known to him regarding the Decedent prior to encountering him on Diamond Bar	0.5	0.5

	Boulevard. He will further testify that the Decedent ignored commands to drop his weapon and approached within close proximity of Mr. Wiseman's vehicle.		
5. Christopher Bronowicki*, c/o defense counsel	He is a Detective for the Los Angeles County Sheriff's Department. He will testify that he witnessed the Decedent walking on Diamond Bar Boulevard with an AR-15 and a bullet-proof vest. He will testify that he provided commands for the Decedent to drop his weapon, which were ignored, while following the Decedent from Crooke Creek Drive to Diamond Bar Boulevard. He will further testify that he and Detective Vazquez used his vehicle for cover while following the Decedent to Diamond Bar Boulevard.	0.5	0.5
6. Carlos De La Torre*, c/o defense counsel	He is a Deputy for the Los Angeles County Sheriff's Department. He will testify that he witnessed the Decedent walking on Diamond Bar Boulevard with an AR-15 and a bullet-proof vest. He will testify that he broadcast that a stabbing victim was in the area. He will testify that he used Detective Bronowicki's vehicle for cover while following the Decedent on Diamond Bar Boulevard.	0.5	0.5
7. Patrick Coussa*, c/o defense counsel	He is a Sergeant for the Los Angeles County Sheriff's Department. He is expected to testify that he witnessed the Decedent walking on Diamond Bar Boulevard with an AR-15 and a bullet-proof vest. He is expected to testify regarding tactics used by the responding deputies and L-TAC	0.5	0.5

	communications during the incident.		
8. Paul Gliniecki, MD, Los Angeles County Department of Medical Examiner, 1101 N Mission Rd, Los Angeles, CA 90033; (323) 343-0512	Dr. Gliniecki performed the autopsy of the Decedent. Dr. Gliniecki will testify that the Decedent was struck by two bullets. He will testify that gunshot #1 entered the Decedent's lower abdomen and exited through his right hip. He will testify that gunshot #1 was potentially fatal. He will testify that gunshot wound #2 entered the Decedent's lower back and exited through his right upper abdomen. He will testify that gunshot wound #2 was rapidly fatal.	0.5	0.75-1
9. Kevin McGovern*, c/o defense counsel	Mr. McGovern is a Los Angeles County Fire Department engineer/paramedic and primary patient caregiver who responded to the shooting of the Decedent. He will testify as to the Decedent's care and response levels in the ambulance after the shooting.	0.5	0.5
10. Keoni Salazar*, c/o defense counsel	Mr. Salazar is a Los Angeles County Fire Department firefighter who responded to the shooting of the Decedent. He will testify regarding the transportation of the Decedent to Pomona Valley Hospital Medical Center	0.5	0.5
11. Robert Farrell*, c/o defense counsel	Mr. Farrell is a Los Angeles County Fire Department Captain who responded to the shooting of the Decedent. He will testify regarding the transportation of the Decedent to Pomona Valley Hospital Medical Center.	0.5	0.5

12.Christopher Poptsis*, c/o defense counsel	Mr. Poptsis is a Los Angeles County Fire Department firefighter who responded to the shooting of the Decedent. He will testify regarding the transportation of the Decedent to Pomona Valley Hospital Medical Center	0.5	0.5
13.Gary Durian*, c/o defense counsel	Mr. Durian is a Los Angeles County Fire Department paramedic driver who responded to the shooting of the Decedent. He will testify regarding the transportation of the Decedent to Pomona Valley Hospital Medical Center.	0.5	0.5
14.Justin Neese*, c/o defense counsel	Mr. McGovern is a Los Angeles County Fire Department primary patient caregiver who responded to the shooting of the Decedent. He will testify as to the Decedent's care and response levels in the ambulance after the shooting.	0.5	0.5
15.Brandon Wiseman, 6840 Dublin Drive, Chino, CA 91710, (909) 544-1842	Mr. Wiseman was in his parked Tesla next to Deputy Barajas while the Decedent walked northbound on Diamond Bar Boulevard. He witnessed the shooting of the Decedent. He is expected to testify regarding his perceptions of the incident, as well as his mental state during the Decedent's encounter with LASD deputies.	0.5	0.5
16.Vergel Sandifer*, 3065 Crooked Creek Dr., Pomona, CA, 91765, (909) 240-5089	Vergel Sandifer witnessed the Decedent prior to the incident with LASD deputies. Mr. Sandifer lives on Crooked Creek Drive. He will testify that he was inside of his home when he heard a loud noise impact the front of his residence. He will testify that he walked outside and observed the Decedent	0.5	0.5

1		armed with a rifle across the street. He will testify that the Decedent raised the rifle and pointed it directly at Mr. Sandifer. Mr. Sandifer will testify that he believed the Decedent pulled the trigger, but the rifle malfunctioned. He will further testify that he heard the suspect fire approximately 7-8 shots. He will testify that he observed the Plaintiff bleeding near the back shoulder area.		
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9	17.Janet Johansen*, 21221 Mapache Drive, Diamond Bar, CA 91765, (909) 568-8296	Ms. Johansen will testify that she was traveling on Crooked Creek Drive when she heard approximately four gunshots. She will testify that she then witnessed the Decedent standing on the sidewalk near the passenger side of her vehicle. She will testify that the Decedent raised his rifle at the sky and fired a round.	0.5	0.5
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15	18.Syed Razvi*	Mr. Razvi will testify that the Decedent came to his house on June 19, 2023, the day of the incident, at approximately 10:00 – 1030 a.m. He will testify that Plaintiff came to his house on June 18, 2023, crying because the Decedent did not come home the day before. He will testify that Plaintiff told Mr. Razvi that the Decedent had been in a depression. He will testify that on June 19, 2023, the Decedent and Plaintiff arrived at Mr. Razvi's residence, and the Decedent asked Plaintiff to leave. The Decedent appeared agitated and wanted to leave after a few minutes. Mr. Razvi will testify that he dropped the Decedent off at home afterwards. Mr. Razvi will testify that Plaintiff called him at approximately 11:36 a.m. and informed him that the Decedent stabbed	0.5	0.5
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1		her.		
2	19.Jonathan	Dr. Marehbian is Defendants' retained	1.0	1.0
3	Marehbian,	neurology expert. Dr. Marehbian was		
4	MD, 8797	retained as a rebuttal expert to		
5	Beverly	Plaintiff's expert and forensic		
6	Blvd., Suite	pathologist, Bennet Omalu, MD. Dr.		
7	350, West	Marehbian will rebut Dr. Omalu's		
8	Hollywood,	opinions regarding the pain and		
	CA 90048,	suffering experienced by the Decedent		
	(424) 234-	before and after being shot.		
	1118			
9	20.Ed Flosi,	Ed Flosi is Defendants' retained police	1.0	1.0 – 1.5
10	1519 E.	practices expert. He will testify that the		
11	Chapman	deputies had a legitimate law		
12	Ave., #34,	enforcement purpose to contact, stop,		
13	Fullerton,	and detain the Decedent based on the		
14	CA 92831,	facts known to Deputy Barajas and		
15	(408) 315-	Detective Vazquez prior to the		
16	0520	encounter, and their observations		
17		during the encounter.		
18		He will testify that the deputies' use of		
19		deadly force to (1) prevent an imminent		
20		threat or serious bodily injury or death		
21		created by the Decedent; and (2)		
22		prevent the escape of a subject that was		
23		armed and had committed a crime		
24		involving infliction or threaten		
25		infliction of serious physical injury or		
26		death was appropriate and consistent		
27		with current law enforcement training		
28		standards in consideration of the		
		"totality of circumstances" presented to		
		them prior to and during their encounter		
		with the Decedent.		
	21.Joel Suss,	Mr. Suss is Defendants' retained human	1.0	1.0 – 1.5
	Ph.D,	factors expert. Mr. Suss will testify that		
	Calgary,	Deputy Barajas and Detective		
	Alberta, CA,	Vazquez's use of deadly force was		

1	(368) 993-8255	reasonable based on the Decedent's ability to raise, point and fire his rifle at the deputies, or civilians, and the deputies' ability to perceive and react to this threat. He will further testify regarding the scientific principles of human reaction time. He will testify regarding Deputy Barajas' and Detective Vazquez's ability to reassess after each shot fired.		
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8	22.Parris Ward,	Mr. Ward is retained as Defendant's forensic video analyst. He synchronized Deputy Barajas' and Detective Vazquez's body-worn camera videos side-by-side to display the incident with the Decedent from both deputies' perspectives, simultaneously. He also prepared a video stabilizing the movement of the Decedent and magnifying the position of the Decedent's body during the shooting. Mr. Ward will testify regarding the programs used to prepare the videos. He will testify regarding the approximate position of the Decedent, Deputy Barajas and Detective Vazquez during the incident. He will testify regarding the time elapse between each shot fired.	0.5	0.5 - 1.0
9	P.O. Box			
10	722, Pacific			
11	Palisades,			
12	CA 90272,			
13	(31) 454-0924			
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21	23.Bennet	Dr. Omalu is the Plaintiff's retained forensic pathology. Dr. Omalu will testify regarding the pain and suffering experienced by the Decedent due to the incident.	1.0	1.0-1.5
22	Omalu, MD,			
23	1621			
24	Executive			
25	Court,			
26	Sacramento,			
27	CA 95864;			
28	(279) 345-1300			

1	24.Jeffrey Noble, 2 Rancho Santa 3 Margarita, 4 CA 92688; 5 (949) 279- 6 4678	Mr. Noble is the Plaintiff's retained police practices expert. Mr. Noble will testify that Deputy Marisol and Detective Vazquez violated LASD policies and procedures by shooting the Decedent.	1.0	1.0-1.5
7	25.Justin Rosander, 8 JSM Forensics, 9 872 Higuera Street, San 10 Luis Obispo, 11 CA 934001; 12 (559) 321- 13 2009, ext. 14 700	Mr. Rosander is the Plaintiff's retained forensic video analyst. Mr. Rosander synchronized and prepared videos showing Deputy Barajas' and Detective Vazquez's body-worn camera footage side-by-side.	0.5	0.5-1